Understanding Section 508 Compliance
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What is Section 508 Compliance?

When developing electronic and information technology (EIT) products for use by individuals with disabilities, Section 508 compliance is a common standard applied to the design requirements and development approach, and validated through quality assurance before implementation. The term “Section 508” refers to a section of the Rehabilitation Act of 1973 that was amended by Congress (as amended by the Workforce Investment Act of 1998) that requires Federal agencies to ensure all EIT products provide comparable access to individuals with disabilities, unless an undue burden would be imposed on the agency. (Note: Wikipedia also refers to the Federal Electronic and Information Technology Accessibility and Compliance Act, but I’m sticking with the information on the government’s Section 508 site.) These products can include: software applications, operating systems, internet/intranet systems, telecommunications, desktop and portable computers, as well as video and multimedia products. Commercial companies have also adopted the standards and whether you realize it or not, you interact with many tools on a day-to-day basis that are in compliance with Section 508. Unless you are a Section 508 expert, who not only understands the requirements but also has real world experience in applying the standards for the various sensory and physical disabilities, doing your research in preparation for a proposal response can be overwhelming and feel as though you’re reading a legal brief or medical dissertation. In addition, so much discussion and documentation has been accumulated over the last decade that a Google search for the term “Section 508” will yield over 7 million hits. The government has even published an entire website relating to Section 508 compliance (see links section below) and there are organizations and focus groups dedicated to best practices, coding standards, tools and resources to help with compliance.

Lastly, it’s important to know that whether or not the RFI/RFP specifies Section 508 as a requirement in the SOO or SOW, if the work being performed for the government results in EIT products, or interfaces with EIT products, you have an obligation to ensure Section 508 compliance. Just remember that there are exceptions where Federal agencies can be in compliance and still not meet the technical requirements, but will require approval from the appropriate governing authority, and often require that the agency provide the data or information through alternate means so that individuals with disabilities can utilize the data or information.

What does it mean to provide “comparable access” to individuals with disabilities?

Think about the process you go through every day to search for information on the internet. What if you had poor eyesight and couldn’t see small text? Wouldn’t you want an option to
increase font size to meet your needs? What if you suffered from color-blindness, or had difficulty viewing text in one color that’s highlighted by another color? Wouldn’t you want a way to see the same information without the color or in some other format? What if you had photosensitive epilepsy and certain patterns or frame rates of flashing text/icons triggered seizures? Wouldn’t you want to avoid that occurrence? What if you had difficulty viewing photos (for whatever vision impairment)? Wouldn’t you want some way to know what the photo represented if it was important to the data or information you were seeking? And what if you had a hearing impairment? Wouldn’t you want a way to adjust the volume of a video or have a transcript to read instead? These are but a few of the examples you might be able to relate to as an individual without disabilities, and some of them even as a matter of preference/convenience. But for individuals with disabilities, this impacts their daily life.

Most vendors involved with EIT have thought through these types of scenarios and included comparable access in a variety of ways. Think about the hardware you are using, or the operating system and software applications that allow you to adjust your screen resolution. Think about when you are viewing a web site and your mouse hovers over an object (photo, video, icon, etc.). A text box (known as an ALT tag) pops up with a description of the object. Think about the web browser itself and the ability to zoom in and zoom out of the specific page you are viewing, or to turn on the advanced options for Accessibility, such as expanding ALT text for images, playing system sounds, resetting text and zoom sizes each time you open a new window or tab. And think about the options some sites provide for customizing the color (theme) of the content to your liking, such as Yahoo Mail provides.

These capabilities aren’t “optional” for the vendors – they are firm requirements that had to be in scope during the development of their products in order to service all members of their target consumers, but specifically for those with sensory and physical disabilities. And for anyone wanting to do business with the government, you not only have to ensure accessibility, but you are subject to auditing for compliance. Otherwise, you may not get paid, or will have to redo the effort which impacts profitability - or worse, a lack of experience and/or poor performance rating may impact your ability to compete for and win new contracts.

Remember too that vendors can still include features and functionality that aren’t in compliance with Section 508, as long as they provide an alternate method for getting the data or information to the consumer with disabilities. In the case of web sites, you will sometimes see a link on the page to their Section 508 compliance statement, with an option to view a Section 508 compliant version of the content. This could easily be satisfied by providing a text-only version of the content (no colors, graphics, videos or other multimedia content) with the ability to size the text. It may further provide information for how to obtain the data or information through alternate means.
So where do you start?
The first thing to do is to become familiar with Section 508 Standards. The link to the standards and a summary of the standards can be found in the link section below. You don’t need to become an expert, just know enough at a high level that you have a starting point for when you need to address specific accessibility requirements.

The next step is to examine your RFI/RFP SOO or SOW to see if there are specific EIT deliverables. In some cases, the RFI/RFP may identify specific Section 508 requirements, but often, the RFI/RFP will only mention that the products must be Section 508 compliant (if it’s mentioned at all). The scope of work will help you to identify the different kinds of accessibility requirements that may need to be addressed in your proposal response. If you’re having trouble identifying all the areas needing addressing, you may want to convene a meeting to discuss with different stakeholders, such as IT support, software developers or specific product vendors to go through each stated requirement to determine where Section 508 compliance is applicable. Usability experts or individuals trained in User Experience Design tend to focus on the end user experience and perceptions as they interact with computers and other objects, and make a tremendous contribution to the software development team in discussing Section 508 compliance.

The next step is to identify whether a Voluntary Product Accessibility Template (VPAT) is required to be submitted with the proposal response. Most software vendors publish their VPATs online, but if you are developing a product internally, you may want to create your own VPAT, which can be supplemented by the VPATs of other products you will utilize to create your product. In the links section below, there is a link to Microsoft’s VPATs as well as a link to a VPAT directory for other vendors.

As a final step, you will want to identify your method for evaluating Section 508 compliance. There are many tools you can purchase which provide reports and findings for your products, but there are also several “free” tools online to test for web-based compliance. One such tool is the Web Accessibility Evaluation Tool (see links section below). For grins, I ran the WAVE tool against the ClinicalRM home page, and it detected 8 accessibility errors – something we may want to address in the future.

How does this impact recruitment and hiring?
For ClinicalRM, we typically provide staff augmentation for on-site government work, versus developing products inhouse and then delivering to the customer or implementing on their behalf. We could also find ourselves in a situation where we do both. For recruiting purposes, you need to be sure any position advertisement (and related Job Description) specifies Section 508 compliance experience as “required”, not “preferred”, and then ask for examples of how they have applied Section 508 compliance during your initial phone screen or interview. Most software developers, for example, are familiar with Section 508 compliance and many functions are automated.
in several application languages. But if they can’t provide examples, or struggle identifying applied features and functionality, they may not be the right fit for the position since Section 508 is more than just a software development function.

In closing...
I hope this provided an overview of what you need to know about section 508 compliance and how to get started. The examples I provided are just the tip of the iceberg in terms of all the things to take into consideration, and any effort will still require research and analysis, so make sure you plan appropriately. Feel free to reach out to me if you have other questions or need assistance researching Section 508 compliance requirements.

A few useful links:

**Section 508 Government site:** [www.section508.gov](http://www.section508.gov)

**Standards:** [https://www.section508.gov/index.cfm?fuseAction=stds](https://www.section508.gov/index.cfm?fuseAction=stds)

**Section 508 VA Checklists:** [http://www.section508.va.gov/Section_508_Checklists.asp](http://www.section508.va.gov/Section_508_Checklists.asp)

**Technology Tools:** [https://www.section508.gov/index.cfm?fuseAction=techtools](https://www.section508.gov/index.cfm?fuseAction=techtools)

**Tools and Resources:** [https://www.section508.gov/index.cfm?fuseAction=tools](https://www.section508.gov/index.cfm?fuseAction=tools)


- **Web Accessibility Evaluation Tool:** [http://wave.webaim.org/](http://wave.webaim.org/)
- **WAVE Checklist for HTML, Scripts, Java, etc.:** [http://webaim.org/standards/508/checklist](http://webaim.org/standards/508/checklist)
- **Microsoft’s VPATS:** [http://www.microsoft.com/government/enus/products/section508/Pages/default.aspx](http://www.microsoft.com/government/enus/products/section508/Pages/default.aspx)
- **VPAT Directory:** [http://www.evengrounds.com/resources/vpat-directory](http://www.evengrounds.com/resources/vpat-directory)
- **HHS VPAT Guide:** [http://www.hhs.gov/od/vendors/vpathhsinstructions.html](http://www.hhs.gov/od/vendors/vpathhsinstructions.html)
- **Frederick National Laboratory Section 508 FAQs:** [http://www.ncifcrf.gov/About/Section508/Faq.aspx](http://www.ncifcrf.gov/About/Section508/Faq.aspx)
- **Frederick National Laboratory PPT:** [http://www.ncifcrf.gov/About/Section508/Media/Documents/Section508.ppt](http://www.ncifcrf.gov/About/Section508/Media/Documents/Section508.ppt)
About Clinical Research Management, Inc.
Clinical Research Management (ClinicalRM) is not only involved in the testing of new antibiotics in Phase I, II, III studies, monitoring protocol development, site selection, and assistance with FDA approvals, but is also involved in responding to the challenges of antimicrobial resistance. Our epidemiologists track resistance patterns around the globe and they evaluate how the observed resistance appears, where it emanates from, and how we can best contain the spread of the new resistance factors.

Our scientists work with the Government and academia to develop new responses to the ever-growing threat of multiple-resistant superbugs. They use in silico techniques, as well as information from genomics, to determine sites on, or in, these organisms that are most likely to be vulnerable to engineered antimicrobials. ClinicalRM is committed to developing new responses to disease and the challenges presented by these super-bugs. If you feel ClinicalRM can add value to your research efforts, we are interested in speaking with you. Call toll free at (800) 431-9640 or visit www.clinicalrm.com

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Tonya Torgeson, CSM, is a Program Manager at Clinical Research Management, Inc. (ClinicalRM) where she is responsible for the success of ID/IQ contracts for the U.S. government. Ms. Torgeson’s expertise in project and program management spans over 20 years with both commercial and government organizations. She is a Certified Scrum Master, active with the Project Management Institute (PMI) and past Founder, Chairman and Co-Chairman of the PMI Consulting SIG.

Ms. Torgeson is a published author, and graduated from the University of Phoenix with a BS in Information Systems.